

GREENSPOON MARDER LLP
 3993 Howard Hughes Parkway, Suite 400
 Las Vegas, Nevada 89169
 Phone: (702) 978-4249/ Fax: (945) 333-4256

Richard W. Epstein, Esq. (admitted *Pro Hac Vice*)
 Jeffrey Backman, Esq. (admitted *Pro Hac Vice*)
 Michelle Durieux, Esq. (admitted *Pro Hac Vice*)
 GREENSPOON MARDER LLP
 200 East Broward Blvd., Ste. 1800
 Fort Lauderdale, FL 33301
 Tel: 954 491-1120
 Facsimile: 954-343-5624
Richard.Epstein@gmlaw.com
Jeffrey.Backman@gmlaw.com
Michelle.Durieux@gmlaw.com

Phillip A. Silvestri, Esq.
 Nevada Bar No. 11276
 GREENSPOON MARDER LLP
 3993 Howard Hughes Parkway, Ste. 400
 Las Vegas, NV 89169
 Tel: 702-978-4249
 Fax: 954-333-4256
Phillip.Silvestri@gmlaw.com

Kimberly Maxson-Rushton
 Nevada Bar No. 5065
 Gregory Kraemer
 COOPER LEVENSON, P.A.
 3016 W. Charleston Blvd., #195
 Las Vegas, NV 89102
 T: (702) 366-1125
 F: (702) 366-1857
krushton@cooperlevenson.com
gkraemer@cooperlevenson.com

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

DIAMOND RESORTS U.S. COLLECTION
 DEVELOPMENT, LLC, a Delaware Limited
 Liability Company,

Plaintiff,

v.

REED HEIN & ASSOCIATES, LLC d/b/a
 TIMESHARE EXIT TEAM, a Washington
 Limited Liability Company; BRANDON REED,
 an individual and citizen of the State of
 Washington; TREVOR HEIN, an individual and
 citizen of Canada; THOMAS PARENTEAU, an

Case No.: **2:17-cv-03007-APG-VCF**

**STIPULATION AND ORDER TO
 EXTEND DEADLINE TO FILE REPLY
 IN SUPPORT OF MOTION FOR
 PROTECTIVE ORDER [ECF #404]**

[First Request]

individual and citizen of the State of Washington; HAPPY HOUR MEDIA GROUP, LLC, a Washington Limited Liability Company; MITCHELL R. SUSSMAN, ESQ. d/b/a THE LAW OFFICES OF MITCHELL REED SUSSMAN & ASSOCIATES, an individual and citizen of the State of California; SCHROETER, GOLDMARK & BENDER, P.S., a Washington Professional Services Corporation; and KEN B. PRIVETT, ESQ., a citizen of the State of Oklahoma,

Defendants.

Pursuant to LR IA 6-1 and Fed. R. Civ. P. 6(b)(1)(A) (“FRCP”), Plaintiff Diamond Resorts U.S. Collection Development, LLC (“Diamond”), Defendant Schroeter Goldmark & Bender, P.S. (“SGB”), and Defendant Reed Hein & Associates *dba* Timeshare Exit Team (“TET”) hereby stipulate to extend the deadlines for Diamond to file its Reply in support of its Motion for Protective Order (the “Motion”) [ECF #404], currently set for April 7, 2021 (SGB), and April 8, 2021 (TET), for a period of nine (9) and eight (8) days, respectively, through April 16, 2021, and as grounds state as follows:

1. Diamond filed the Motion on March 4, 2021.
2. The Parties stipulated to extend SGB’s and TET’s deadlines to respond to the Motion through April 8, 2021.
3. SGB filed its response to the Motion on April 1, 2021.
4. TET filed its response to the Motion on April 2, 2021.
5. As the Court is aware, Diamond is currently in the process of taking Depositions on Written Questions of the Identified Owners, which is taking a substantial amount of time for all parties.
6. In addition, the Parties, particularly Diamond and TET, are currently working to revolve various time-sensitive issues related to the DWQs of the Identified Owners.
7. In order to adequately reply to SGB and TET’s responses, and to harmonize the reply deadlines relative to both SGB and TET’s responses, the Parties have agreed to extend Diamond’s deadline to file its Reply in support of the Motion SGB’s Motion, and the issues

presented therein, the Diamond and SGB agree that Diamond's deadline to file its response should be extend through April 16, 2021.

8. This is the Parties' first request for extension of this deadline, and it is not intended to cause any delay or prejudice to any party. Defendant does not object to the requested extension.

Dated this 5th day of April, 2021.

GREENSPOON MARDER LLP

LIPSON NEILSON, P.C.

/s/ Phillip A. Silvestri, Esq.

/s/ Megan H. Thongham, Esq.

PHILLIP A. SILVESTRI, ESQ.

JOSEPH P. GARIN, ESQ.

Nevada Bar No. 11276

Nevada Bar No. 6653

3993 Howard Hughes Parkway, Suite 400
Las Vegas, NV 89169

MEGAN H. THONGHAM, ESQ.

Nevada Bar No. 12404

9900 Covington Cross Drive, Suite 120

Las Vegas, NV 89144-7052

Attorneys for Plaintiff

Diamond Resorts U.S. Collection
Development, LLC

Attorneys for Defendant SGB

**GORDON REES SCULLY
MANSUKHANI, LLP**

/s/ David T. Gluth, Esq.

ROBERT S. LARSEN, ESQ.

Nevada Bar No. 7785

DAVID T. GLUTH, II, ESQ.

Nevada Bar No. 10596

DIONE C. WRENN, ESQ.

Nevada Bar No. 13285

300 South 4th Street, Suite 1550

Las Vegas, Nevada 89101

Attorneys for TET

IT IS SO ORDERED


UNITED STATES MAGISTRATE JUDGE

DATED: 4-9-2021

GREENSPOON MARDER LLP
3993 Howard Hughes Parkway, Suite 400
Las Vegas, Nevada 89169
Phone: (702) 978-4249/ Fax: (945) 333-4256

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system on this 5th day of April, 2021. I also certify that the foregoing document is being served this day on all counsel of record or *pro se* parties identified on the Court's Service List via transmission of Notices of Electronic Filing generated by CM/ECF. For any counsel or parties who are not are not authorized to receive Notices of Electronic Filing electronically, I certify that I served those parties via First Class U.S. Mail.

/s/ Phillip A. Silvestri
An employee of Greenspoon Marder LLP

GREENSPOON MARDER LLP
3993 Howard Hughes Parkway, Suite 400
Las Vegas, Nevada 89169
Phone: (702) 978-4249/ Fax: (945) 333-4256